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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

MINNY FRANK,

Case No. 6:11-cv-06402-AA

Plaintiff,

v.

CASCADE HEALTHCARE COMMUNITY,
INC. dba ST. CHARLES MEDICAL
CENTER; MAGNUS LAKOVICS, MD;
EDWARD PALMER, MD,

Defendants.

MOTION FOR PROTECTIVE ORDER

By Cascade Healthcare Community, Inc.

***REQUEST FOR ORAL ARGUMENT
EXPEDITED HEARING REQUESTED***

LR 7.1 Certification

Pursuant to Local Rule 7.1, counsel for defendant Cascade Healthcare Community, Inc., dba St. Charles Medical Center has conferred with plaintiff but the parties were unable to resolve the issues raised herein. *See*, Declaration of Kirstin L. Abel and attached Exhibits.

MOTION

Defendant moves for an order from the Court granting the following:

- 1) An order enjoining plaintiff from having any further contact with any represented parties in this case, including employees, executives, and board members of defendant, and via

MOTION FOR PROTECTIVE ORDER - Page 1

Doc No. 328431

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email, correspondence, online video, Facebook, Twitter, Youtube, or any other means.

2) An order requiring plaintiff to remove all videos, websites, blog posts, Facebook pages/posts, Twitter posts, or other online content relating to this lawsuit or the facts underlying it.

3) An order enjoining plaintiff from posting any further videos, websites, blog posts, Facebook pages/posts, Twitter posts, or other online content relating to this lawsuit or the facts underlying it.

4) If plaintiff violates the orders set out above, defendants move for the Court to impose sanctions up to and including monetary penalties, striking of plaintiff's pleadings, and dismissal.

DATED this 16th day of July, 2012.

KEATING JONES HUGHES, P.C.

s/ Kirstin L. Abel

Kirstin L. Abel, OSB No. 035046
503-222-9955

Attorneys for Cascade Healthcare Community, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **MOTION FOR PROTECTIVE ORDER** on the following:

Minny Frank
1803 Buttermilk Lane
Arcata, CA 95521
Phone: (707) 822-3844
Fax: (240) 358-0424
Plaintiff Pro Se

Via Electronic Court Service

Gordon L. Welborn
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439 SW Umatilla Avenue
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Phone: (541) 548-6044
Fax: (541) 548-6034
Of Attorneys for Edward Palmer, MD

Via Electronic Court Service

by the method indicated above on said day.

DATED this 16th day of July, 2012.

KEATING JONES HUGHES, P.C.

s/ Kirstin L. Abel

Kirstin L. Abel, OSB No. 035046
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Of Attorneys for Cascade Healthcare Community, Inc.

Trial Attorney: Steven P. Jones, OSB No. 782628

CERTIFICATE OF SERVICE - Page 3

Doc No. 328431

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